

From: [Casey, Carolyn](#)
To: [Craig Ziady](#); [Zucker, Audrey](#)
Cc: [Wainberg, Daniel](#); [Bruce Hoskins](#); [Gregory Flaherty](#); [Murphy, Jim](#); [Steve Drohosky](#)
Subject: RE: Notice of January 2018 sampling
Date: Tuesday, January 02, 2018 10:20:00 AM

Is the sampling still firm for the weekend of 1/13-1/15?

Could you make these indoor air samples 8 hour samples so they will be representative of the time children spend in the day care/schools? Also, could you confirm that the HVAC system will be remain set consistently with what it is during the week?

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

casey.carolyn@epa.gov

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Wednesday, December 20, 2017 5:23 PM

To: Zucker, Audrey ; Casey, Carolyn

Cc: Wainberg, Daniel ; Bruce Hoskins ; Gregory Flaherty ; Murphy, Jim ; Steve Drohosky

Subject: Notice of January 2018 sampling

Audrey, Carolyn, et al. – Further to our prior notices, the schedule for the VI and related sampling in January 2018 is set forth below.

Saturday, January 13, 2018: 8:00 am -- set up indoor air samples.

Sunday, January 14, 2018: 8:00 am -- shut off indoor air samples; begin soil vapor sampling.

Monday, January 15, 2018: Perform groundwater sampling; complete remaining soil vapor samples (if any).

Please let me know if you have any questions.

Thank you.

Craig

Craig J. Ziady

General Counsel

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From: Zucker, Audrey [<mailto:Zucker.Audrey@epa.gov>]

Sent: Wednesday, December 20, 2017 9:54 AM

To: Craig Ziady; Casey, Carolyn
Cc: Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Murphy, Jim; Steve Drohosky
Subject: RE: Former USM facility, Beverly, MA

Craig –

This is to confirm that Jim Murphy and Carolyn Casey will attend the meeting with Cummings and The Learning Zone on Jan. 4, 2018 at 9:30, and the meeting with Cummings and Bright Horizons on Jan. 4, 2018 at 11 am.

Can you please schedule the meetings with Northeast Arc and Aspire Learning Center for the same date, Jan. 4th.

As to your question on availability for the week of Jan. 15-19, we are confused. Are you still planning to perform the VI sampling over the MLK weekend (Jan. 13-15). Please advise.

Audrey

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Tuesday, December 19, 2017 5:28 PM

To: Zucker, Audrey <Zucker.Audrey@epa.gov>; Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Murphy, Jim <Murphy.Jim@epa.gov>; Steve Drohosky <sjd@cummings.com>

Subject: RE: Former USM facility, Beverly, MA

Hi Audrey – So the holiday/vacation weeks are creating some difficulty with scheduling. That said, we have confirmed meetings with The Learning Zone and Bright Horizons for January 4, 2018 at 9:30 AM and 11:00 AM respectively (the meetings will be separate).

Could you please send me your/Carolyn's/Jim's availability for the week of January 15-19? From that, I expect we will be able to confirm dates/times for the remaining two clients (Northeast ARC and Aspire Learning Center).

Thanks very much.

Craig

From: Zucker, Audrey [<mailto:Zucker.Audrey@epa.gov>]

Sent: Friday, December 15, 2017 12:32 PM

To: Craig Ziady; Casey, Carolyn

Cc: Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Murphy, Jim; Steve Drohosky

Subject: RE: Former USM facility, Beverly, MA

Craig:

This is in response to the issue concerning scheduling meetings with day care facilities. We were waiting for your proposed dates. However, I have just checked with both Carolyn and Jim. They are both available as follows:

Dec. 18 – 21: anytime except in the afternoon on 12/20

Dec. 26 – 29: anytime

Jan. 2: anytime

Jan. 4: anytime, except after 3 pm

Jan. 8 – Jan. 10: anytime

Please get back to me by close of business on Dec. 18th with proposed dates for these meeting(s) with the day care facilities, per my email to you earlier today.

Audrey

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, December 15, 2017 11:47 AM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; Steve Drohosky <sjd@cummings.com>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – The first half of your email is puzzling.

You indicate, for instance, that you have not been receiving updates. We disagree. We have been in regular contact throughout the past month leading up to the sampling and specifically notified EPA about the schedule on November 17 (in writing); November 27 (in writing); November 28 (in writing); November 30 (orally, during telephone call); December 1 (orally, during telephone call); and December 5 (orally, during telephone call).

The non-vapor intrusion monitoring wells were sampled on December 12, 2017. One of the 12 wells (FSL-2) was dry, so we expect to receive data from 11 sampled wells within the next couple of weeks. The remaining wells (10 of them, I believe) will be sampled in January, at or around the time that the soil gas and indoor air sampling is also performed. Given your comment about performing the work on a weekend, we are planning on MLK weekend (January 13-15, 2018) and are in the process of lining up equipment and personnel toward that end.

That said, we are still waiting to hear back from EPA on Jim Murphy's availability to meet with the day care center owners and us. During our call on December 5, Jim acknowledged that this week was going to be busy for him, but he would provide some dates that we could then cross-reference on our end. I don't think anyone here has received dates yet. Please advise.

Finally, during our call on November 30, you indicated that you were going to confirm with your ecological people that for the sake of efficiency, we could incorporate our SLERA comments into a BERA. I don't believe we have heard back on that. Please confirm at your convenience so we can dispatch our ecological consultant to resume work.

Thanks very much.

Craig

Craig J. Ziady

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Thursday, December 14, 2017 10:08 AM

To: Craig Ziady

Cc: Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Zucker, Audrey; Murphy, Jim

Subject: RE: Former USM facility, Beverly, MA

Again, could I please get an update on field work. Did anything happen this week? Is anything planned for today or tomorrow? Please refer to the order about notification on field work. I have not been receiving updates or progress reports in accordance with the order. I was otherwise occupied this week and actually forgot about the sampling. A notification of the exact dates of any field work

was required and would have been appreciated.

Could we also please get an update on contact with tenants at the facility. How did the conversations go? Any proposed meeting dates?

A couple of reminders for the indoor air sampling. Samples should be collected on a weekend where the doors can remain closed. The chain of custody (COC) for the 3/15 indoor air sampling event contains some discrepancies wrt the ending pressure on the canisters as compared to the canister and flow controller data from the lab. Pictures of the flow regulators should be provided along with detailed field logs for each sampling event. Units for vacuum should be provided in the COC. Also, the canisters should be collected at the end of the 8 hour sampling event (or 24 hour, consistent with the work plan). The COC indicates that these samples were collected for closer to 37 hours and the vacuum pressure reached 0 (assumed in. Hg). This data cannot be used in a quantitative risk assessment as the actual length of time that the air sample was collected is unknown. Also, the sample collection date is listed as 2014, not 2015. More attention should be paid to correctly and completely filling out the COC forms.

Thanks

Carolyn

From: Casey, Carolyn

Sent: Friday, November 17, 2017 8:18 AM

To: 'Craig Ziady' <craig@cummings.com>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Could I please get a detailed schedule of the field work so I can observe when my schedule allows. As a reminder Section IX.17.k. of the order states the following:

Communications: Respondents and EPA will communicate frequently, cooperatively, and in good faith with each other to assure successful completion of the requirements of this Order. In addition, Respondents shall schedule a meeting with EPA at least once a month to discuss the Work proposed and performed under this Order.

Respondents shall notify EPA with a proposed date for sampling: (1) at least 21 days in advance of any sampling activities; (2) thereafter, weekly up to the date of sampling; and (3) when a sampling date is firm.

Regarding your request... "Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor."

I am available all day next Monday 11/20, and Tues 11/21 and Wed before 10:00. The week of Nov 27th, I am available all day Mon and Wed, and Thurs except 11:30-12:30.

Thanks

Carolyn

Carolyn J. Casey

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From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Wednesday, November 08, 2017 5:19 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Thanks for reaching out. I was out of town last week.

The GPR and drilling work is ongoing. Sampling is expected to commence thereafter, probably beginning in December given the timing of the final approval by EPA and the DigSafe/GPR/drilling work.

In response to your recent request for additional information relative to the location of the former North Shore Regional Vocational School machine shop, please see the enclosed excerpt from a May 19, 1989 AHERA Management Plan prepared by Hygeia, Inc. This report, which related to asbestos-containing material within the old USM building, contained detailed handwritten plans of the layout of the NSRVHS, including characterization of the floor sequence as “basement” through “third floor” (see attached plans). Please confirm that we may pursue the PCB sampling in the area shown as “Machine Tech” rooms shown on the “Third Floor Plan,” as proposed.

Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor? We believe it would be advantageous for us all to have a brief meeting prior to submittal of the work plan and can make ourselves available for a conference call or meeting that works for your schedule.

Finally, in response to your request for two minor revisions to the QAPP, please see attached (revised) page 15, which incorporates your changes. This page may be substituted for the previously submitted page 15 of the QAPP.

Thanks very much.

As always, please let me know if you have any questions.

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, November 08, 2017 2:25 PM

To: Craig Ziady

Cc: Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Zucker, Audrey

Subject: RE: Former USM facility, Beverly, MA

Could I please get an update on when work will start?

Thank You,

Carolyn

Carolyn J. Casey

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From: Casey, Carolyn
Sent: Wednesday, October 11, 2017 8:09 AM
To: 'Craig Ziady' <craig@cummings.com>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; 'Bruce Hoskins' <BHoskins@FslAssociates.com>; 'Gregory Flaherty' <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>
Subject: RE: Former USM facility, Beverly, MA
As promised, pdf version attached.

From: Casey, Carolyn
Sent: Friday, October 06, 2017 2:21 PM
To: 'Craig Ziady' <craig@cummings.com>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>
Subject: RE: Former USM facility, Beverly, MA

Please see the attached files. I apologize for the unorthodox method of sending these documents but I have been waiting for IT to fix my scanner and I didn't want to wait any longer. I will send signed pdf documents ASAP. A hard copy to Craig will be in the mail next week.

Thanks

Carolyn

Carolyn J. Casey

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From: Craig Ziady [mailto:craig@cummings.com]
Sent: Thursday, October 05, 2017 5:15 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA
Hi Carolyn – Both items are attached. Please return a fully executed Title and Approval page when it is completed.

Thank you.

Craig

Craig J. Ziady
General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Thursday, October 05, 2017 3:18 PM

To: Craig Ziady

Cc: Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty

Subject: RE: Former USM facility, Beverly, MA

Just to clarify, I was looking for the original unmodified version of the figure for the vocational school. When should I expect this and the QAPP signature page?

From: Casey, Carolyn

Sent: Wednesday, October 04, 2017 4:35 PM

To: 'Craig Ziady' <craig@cummings.com>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Subject: RE: Former USM facility, Beverly, MA

Thank you for the recent submittals. Could you please scan and email the figure for the Vo Tech school. It was not included in the SAP. Also, please sign the QAPP approval page and email that to me as well. I expect to send out an approval as soon as I get these.

Thanks

Carolyn

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, September 29, 2017 1:25 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Further to our recent correspondence and as a supplement to our written responses, please find enclosed redlined versions of the QAPP, USM Written Proposal/SAP, and Elliott Landing SAP that reflect the changes made pursuant to EPA's comments. I will forward a link to the full QAPP (766 pages) under separate cover due to its file size.

Please let me know if you have any questions.

Thank you

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, September 27, 2017 4:23 PM

To: Craig Ziady; Bruce Hoskins; Gregory Flaherty

Cc: Zucker, Audrey; Wainberg, Daniel

Subject: RE: Former USM facility, Beverly, MA

The timeline for submittals is in the order. The comments were sent by email 9/5. The hard copy was received 9/11 so revised reports were due by 9/25. That being said, an extension until Friday would be acceptable.

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Wednesday, September 27, 2017 11:05 AM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – We were attempting to move this process along most efficiently by not resubmitting all of the reports and simply providing our responses, so they could be incorporated in the reports once EPA approved them. I'm sorry you viewed this as inadequate.

We will revise the documents per your request, but we are not going to be able to finalize them by close of business today. Given that no deadline existed for the comment responses in the first place, they are by no means late. We assume you will not object/disapprove if the documents are submitted by the end of the week.

Please confirm. We will begin working on them today.

With regard to the specific comment you reference, this is specifically addressed in the SOP. Given the number of plans/reports we are submitting, there will, of course, be cross-references to one another, which is what occurred here.

Thank you.

Craig

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, September 27, 2017 10:03 AM

To: Craig Ziady; Bruce Hoskins; Gregory Flaherty

Cc: Zucker, Audrey; Wainberg, Daniel

Subject: FW: Former USM facility, Beverly, MA

Craig, This response is inadequate. It's not possible to complete our review without actually seeing the revisions in context. The response to comments alone is insufficient. I will issue a formal

disapproval by the end of the day if the comments have not all been appropriately addressed within the documents and resubmitted by COB today.

Again, a complete review could not be completed but I am passing the following comments along now regarding the Written proposal/SAP North Parcel

This response does not address the second part of the comment asking if more than one sample will be collect at each depth interval. The point being that multiple concrete samples need to be collected at each location for each depth interval in order to collect a sufficient volume to achieve required detection limits. Again, please re-visit the SOPs.

EPA Comment: In the second paragraph on page 24, the discussion of the SOP for concrete needs to be revisited. The 0-0.05 inch-depth interval does not make sense. Further, it is unclear if only 1 sample would be collected at each depth interval per sample location. If so, this would likely not be a sufficient volume for the laboratory to achieve required detection limits.

Response: *The text has been revised consistent with the STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs) in the QAPP. The 0-0.05 inch depth interval has been eliminated. Intervals to be collected will be 0-0.5 inches and 0.5-1.0 inches.*

Regarding the Elliot Landing SAP and the first comment in the response. This section should clarify what threshold criteria means as stated in the last response from Cummings (It should be clear threshold criteria is not referring to threshold values).

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casey.carolyn@epa.gov

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, September 22, 2017 5:52 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Thank you for your most recent set of comments. Please see our responses attached. We have not included final amended documents, as it seems to make sense to finalize the comments first rather than proceed through the exercise of making serial minor revisions to the plans and documents at each stage. We will provide final revised documents promptly following resolution of these final comments.

As always, please let me know if you have any questions.

Thank you.

Best,

Craig

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Tuesday, September 05, 2017 4:27 PM
To: Craig Ziady
Cc: Zucker, Audrey; Bruce Hoskins; Gregory Flaherty; Wainberg, Daniel; Knox, Rosemary (DEP); Miano, John (DEP)
Subject: RE: Former USM facility, Beverly, MA - redlined documents
Please see attached. A hard copy to follow to Craig only. If others would like one, please let me know.

Thanks
Carolyn
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From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Friday, August 04, 2017 12:35 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: Former USM facility, Beverly, MA - redlined documents
Carolyn - Finally, as a supplement to the full reports sent under separate cover, here are the redline versions of the QAPP, USM Written Proposal, and Elliott Landing SAP.
We did not prepare separate redlines of the QMP or HASP due to the singular changes to those documents.
Please let me know if you have any questions.
Thank you.

Craig
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